



California Regional Water Quality Control Board

Central Coast Region



Winston H. Hickox
Secretary for
Environmental
Protection

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Gray Davis
Governor

September 30, 2003

Mr. Richard W. McClure
Olin Corporation
Environmental Remediation Group
PO Box 248
Charleston, TN 37310-0248

Mr. Jay McLaughlin
President and CEO
Standard Fusee Corporation
PO Box 1047
Easton, MD 21601

Dear Mr. McClure and Mr. McLaughlin:

425 TENNANT AVENUE, MORGAN HILL; REQUEST FOR EXPANDED SITE ASSESSMENT

This is a revised version of a letter originally dated September 4, 2003.

As you are aware, perchlorate has been detected in several wells north of Tennant Avenue in Morgan Hill, including three wells used by the City of Morgan Hill for public water supply.

Pursuant to Water Code section 13267, please submit by **October 10, 2003**, to the Regional Board a plan for determining if detections of perchlorate found in wells between Olin's property and Morgan Hill's Nordstrom Park well are related to perchlorate releases at the subject site. Based on our professional judgment, to provide scientifically complete data and valid conclusions, Olin and Standard Fusee must at a minimum identify all water wells in the area within roughly one-fourth of a mile from a line connecting Olin's property and the Nordstrom Park well (including Morgan Hill's Condit well), provide data for any of those wells that have been sampled for perchlorate, and propose a monitoring and sampling program that will provide sufficient data to determine the extent of perchlorate-degraded groundwater northeast of Olin's property and groundwater gradients in the area. You may develop a plan that does not include these elements, but you must provide scientific justification for the validity and completeness of the proposal.

The Regional Board needs the information required by this letter to determine the extent of perchlorate contamination and to determine whether Olin and Standard Fusee are responsible for contamination found northeast of the site.

Water Code section 13267 authorizes the Regional Board to direct a person who is suspected of discharging waste that could affect water quality to provide technical and monitoring program reports that the Regional Board requires.

The evidence that supports requiring Olin and Standard Fusee to provide the plan required by this letter includes the following:

California Environmental Protection Agency



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1. Olin's property on Tennant Avenue is the only site in the area that we are aware of with confirmed releases of perchlorate to the environment.
2. Although groundwater appears to flow naturally in a southeast direction, there are conditions that could cause perchlorate-degraded water to migrate from Olin's property to the northeast. Pumping-induced gradient changes is one such condition. Water-level data, both current and historic, show that the gradient is relatively shallow in this area and could be influenced by the right set of pumping conditions. Successive pumping, irrigation, and infiltration could also have caused migration of degraded water over many years.

Additional supporting evidence can be found in the Regional Board files.

If you have any questions or wish to review the applicable evidence in Regional Board files, please contact **A. John Mijares at (805) 549-3696** or Harvey Packard at (805) 542-4639.

Sincerely,

Roger W. Briggs
Executive Officer

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